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Attorneys for Defendants
SHANGHAI ZHENHUA HEAVY
INDUSTRIES CO., LTD. (erroneously
sued as SHANGHAI ZHENHUA
PORT MACHINERY CO., LTD) AND
SEASIDE TRANSPORTATION SERVICES, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

VC

JACKIE ARNETT,

Plaintiff,

vs.

SHANGHAI ZHENHUA PORT MACHINERY
CO. LTD.; SEASIDE TRANSPORTATION
SERVICES, LLC; WHITNEY EQUIPMENT
LLC; and DOES 1 through 100, inclusive,

Defendants.

Case No. 13-cv-01672-~~WHC~~

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINES
AS MODIFIED**

Judge: Hon. Vince G. Chhabria

Complaint Filed: March 1, 2013

1 WHEREAS, Plaintiff Jackie Arnett filed her complaint for damages naming only Defendants
2 Whitney Equipment LLC (“Whitney”) and Seaside Transportation Services, LLC (“STS”) in
3 Alameda County Superior Court on March 1, 2013.

4 WHEREAS defendants Whitney and STS removed this case to the Northern District on April
5 12, 2013.

6 WHEREAS on September 13, 2013, Plaintiff filed a First Amended Complaint adding
7 defendant Shanghai Zhenhua Heavy Industries Co., Ltd. (erroneously sued as Shanghai Zhenhua Port
8 Machinery Co., Ltd., hereinafter “ZPMC”).

9 WHEREAS Plaintiff filed as Second Amended Complaint on November 4, 2013 in response
10 to ZPMC’s motion to dismiss Plaintiff’s First Amended Complaint.

11 WHEREAS ZPMC filed a motion to dismiss Plaintiff’s Second Amended Complaint, which
12 was granted in part and denied in part on January 13, 2014.

13 WHEREAS The Court granted Plaintiff leave to amend her negligence allegations in order to
14 clarify what conduct each defendant has allegedly engaged in that supports each of the theories
15 underlying her negligence causes of action.

16 WHEREAS Plaintiff filed her Third Amended Complaint on February 3, 2014, and parties
17 responded.

18 WHEREAS the Court set a Pre-trial Scheduling Order on April 1, 2014.

19 WHEREAS the Court amended the Pre-trial Scheduling Order on October 28, 2014, and
20 ordered parties to complete private mediation by January 30, 2015.

21 WHEREAS parties completed mediation on January 26, 2015.

22 WHEREAS parties now request an extension for expert rebuttal reports, to complete expert
23 depositions and discovery, and to file summary judgment motions in order to accommodate a further
24 private mediation agreed to by parties and scheduled for February 9, 2015.

NOW THEREFORE, IT IS STIPULATED by and between the parties, subject to the approval of the Court pursuant to Local Rule 6-2, to extend discovery deadlines set in the case schedule (Dkt. Nos. 69, 84) as follows:

EVENT	CURRENT DEADLINE	REQUESTED EXTENSION DATE
Expert Rebuttal	February 2, 2015	February 16, 2015
Close of Expert Discovery	March 13, 2015	April 3, 2015
Dispositive Motions Heard by	May 6, 2015	May 27, 2015

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K&L GATES LLP

Dated: _____

By: /s/ Michele C. Barnes

MICHELE C. BARNES
ROSEANNA M. CASTILLO
Attorneys for Defendants
SHANGHAI ZHENHUA PORT
MACHINERY CO., LTD

ARCHER NORRIS

Dated: _____

By: /s/ Keith R. Gillette

KEITH R. GILLETTE
CHAD D. GREESON
Attorneys for Defendant
WHITNEY EQUIPMENT, LLC

Dated: _____

WILSON ELSE LLP

By: /s/ William Enger

William Enger
Attorneys for Defendant SEASIDE
TRANSPORTATION SERVICES

THE ARNS LAW FIRM

Dated: 1/29/15

By: 

ROBERT S. ARNS
JONATHAN E. DAVIS
Attorneys for Plaintiff
JACKIE ARNETT

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2
3
4 Dated: February 6, 2015

By:

Hon. M.
U.S. Di

